

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

NOV 17 2017 ^{TG}

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Vernon Ellison

Plaintiff(s),

vs.

Great Cakes
US Education

Defendant(s).

17 CV 8337

JUDGE GUZMAN

MAGISTRATE JUDGE VALDEZ

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is _____.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

4. Defendant, Great Lakes, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)
_____ or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is _____. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about _____, at approximately _____ ☐ a.m. ☐ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of _____
_____, in the County of _____,
State of Illinois, at _____,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____
- ☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

This Matter has been going on over 20 years. I do not owe \$7,000. Never Cash a Check for \$1500. It has been investigate. Show me proof, Need this taken of my Credit report. Great Lake has never could Show me proof that I cash a check for \$1500.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ *(Place X in box if you are seeking punitive damages.)* Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: 

Plaintiff's name *(print clearly or type)*: Vernon Ellison

Plaintiff's mailing address: 8133 S. Commercial

City Chicago State IL ZIP 60617

Plaintiff's telephone number: (773) 731-0718

Plaintiff's email address *(if you prefer to be contacted by email)*: —

11-17-17

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.



June 15, 2017

002218

#BWNKPXF
#9690722880000000# BS
VERNON A. ELLISON
8133 S COMMERCIAL AVE
CHICAGO IL 60617-1544



U.S. Department of Education
Information about your federal student loan

Check Out Our Knowledge Center

Knowledge Center, available on the Great Lakes website, is your one-stop shop to explore a variety of resources that can help you better understand your federal student loan. Check it out today!

mygreatlakes.org/go/knowledgecenter

Hi Vernon,

You were enrolled in an income-driven repayment plan. Right now you're making the maximum monthly payment from your payment schedule because we didn't receive your renewal paperwork or your income no longer qualifies you for a reduced payment. You can view your payment schedule at mygreatlakes.org/go/paymentschedule.

But there's good news—if your financial circumstances change at any time, you can apply for a reduced payment.

For more information about renewing your income-driven repayment plan and potentially reducing your monthly payment to as low as \$0, visit mygreatlakes.org/go/incomeplans. **To complete an application online**, visit StudentLoans.gov.

Let us know if you have any questions—we're here to help you.

Sincerely,

Great Lakes Borrower Services

Contact Us for Help or Make a Payment

Your Great Lakes ID: 96-9072288



mygreatlakes.org

Access account information,
make payments, visit the
Knowledge Center, or email us.



(800) 236-4300 or (608) 246-1700
TTY: 711
Monday - Friday 7:00 am - 9:00 pm CT



*Payment address only. Please include
your Great Lakes ID.*
U.S. Department of Education
PO Box 530229
Atlanta, GA 30353-0229

You can self-serve 24/7 online or by phone. Some calls may be monitored or recorded for quality assurance purposes.

GREAT LAKES EDUCATIONAL LOAN SERVICES, INC.
MYGREATLAKES.ORG

A Snapshot of Your Great Lakes-Serviced Student Loan Accounts as of 6/15/2017

Loan Type	Lender	Principal Balance and Interest Rate		Accrued Interest	Account Balance	Next Payment	
		Subsidized	Unsubsidized			Due Date	Amount
Accounts Referenced in this Letter ¹							
Income-Based Repayment Plan (IBR)							
Consolidation	U.S. DEPARTMENT OF EDUCATION (799581)	\$6,844.28 @ 3.450%	\$0	\$170.25	\$7,014.53	7/10/2017	\$260.04
		Total Balance for Loans in IBR Repayment Plan:			\$7,014.53		

¹ Any Parent PLUS loans or Consolidation Loans that paid off a Parent PLUS loan do not qualify for Income-Based Repayment, Pay As You Earn, or Revised Pay As You Earn repayment plans. Consolidation Loans that paid off a Parent PLUS loan may qualify for Income-Contingent Repayment.

Loan Type The type of student loan you borrowed.

Lender The organization that loaned you money for school, such as banks, credit unions, or the U.S. Department of Education.

Principal Balance and Interest Rate The amount of money you borrowed for school and the interest rate, minus any principal payments or refunds received.

Subsidized This amount doesn't build up interest during certain statuses because the federal government pays it for you, unless you reach the 150% subsidy limit and lose the government subsidy.

Unsubsidized This amount always builds up interest.

Accrued Interest The amount of interest that has built up so far.

Account Balance The principal balance plus the interest that's built up so far. Keep in mind, this is not your payoff amount.

Next Payment Due Date and Amount The date your next payment and amount is due (includes any past due amount).